

Exhibit 4



Transcript of **Richard Grenell**

Monday, July 17, 2023

Richard Grenell v. Olivia Troye

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Reference Number: 130751

1 VIRGINIA:

2 IN THE CIRCUIT COURT OF THE CITY OF ALEXANDRIA

3 - - - - - X

4 RICHARD GRENELL, :

5 Plaintiff, :

6 v. : Case No.

7 OLIVIA TROYE, : CL22001907

8 Defendant. :

9 - - - - - X

10 Monday, July 17, 2023

11 Videoconference Deposition of RICHARD
12 GRENELL, Plaintiff herein, called for examination by
13 counsel for Defendant in the above-entitled matter,
14 pursuant to notice, the witness being duly sworn by
15 Desirae S. Jura, a Notary Public in and for the
16 Commonwealth of Virginia, held at 1751 Pinnacle
17 Drive, Suite 1000, Tysons, Virginia at 9:01 a.m., ET,
18 Monday, July 17, 2023, and the proceedings being
19 taken down by Stenotype by Desirae S. Jura, RPR, and
20 transcribed under her direction.

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22

<p>Page 2</p> <p>1 APPEARANCES:</p> <p>2</p> <p>3 On behalf of the Plaintiff:</p> <p>4 JESSE BINNALL, ESQ.</p> <p>5 JASON GREAVES, ESQ.</p> <p>6 BINNALL LAW GROUP, PLLC</p> <p>7 717 King Street, Suite 200</p> <p>8 Alexandria, Virginia 22314</p> <p>9 (703) 888-1930</p> <p>10 jesse@binnall.com</p> <p>11 jason@binnall.com</p> <p>12</p> <p>13 On behalf of the Defendant:</p> <p>14 MARK S. ZAID, ESQ. (pro hac vice)</p> <p>15 MARK S. ZAID, P.C.</p> <p>16 1250 Connecticut Avenue, N.W.</p> <p>17 Washington, DC 20036</p> <p>18 (202) 498-0011</p> <p>19 Mark@MarkZaid.com</p> <p>20</p> <p>21</p> <p>22</p>	<p>Page 4</p> <p>1 C O N T E N T S</p> <p>2 WITNESS EXAMINATION BY COUNSEL FOR</p> <p>3 RICHARD GRENELL DEFENDANT</p> <p>4 BY MR. ZAID 9</p> <p>5</p> <p>6 E X H I B I T S</p> <p>7 GRENELL EXHIBIT NO. PAGE</p> <p>8 1 - Notice of Deposition 12</p> <p>9 2 - Notice of Deposition 15</p> <p>10 3 - Executive Branch Personnel Public</p> <p>11 Financial Disclosure Report</p> <p>12 (OGE Form 278e) 17</p> <p>13 4 - Cover Sheet for Filing Actions,</p> <p>14 Complaint 30</p> <p>15 5 - The Washington Post article, dated</p> <p>16 August 24, 2020, "The absurd claim</p> <p>17 that Trump is the 'most pro-gay</p> <p>18 President in American history'" 48</p> <p>19 6 - Defendant Olivia Troye's Revised</p> <p>20 Responses and Objections to</p> <p>21 Plaintiff Richard Grenell's First</p> <p>22 Interrogatories 53</p>
<p>Page 3</p> <p>1 APPEARANCES (cont.):</p> <p>2</p> <p>3 On behalf of the Defendant (cont.):</p> <p>4 THOMAS M. CRAIG, ESQ.</p> <p>5 FLUET HUBER + HOANG</p> <p>6 1751 Pinnacle Drive</p> <p>7 Suite 1000</p> <p>8 Tysons, Virginia 22102</p> <p>9 (703) 590-1234</p> <p>10 tcraig@fhhfirm.com</p> <p>11</p> <p>12 ALSO PRESENT:</p> <p>13 CORA POTOTSKY, Paralegal</p> <p>14 NORMAN REYNOLDS, Videographer</p> <p>15 OLIVIA TROYE (telephonically)</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p>Page 5</p> <p>1 E X H I B I T S</p> <p>2 GRENELL EXHIBIT NO. PAGE</p> <p>3 7 - The Jewish Voice article dated</p> <p>4 12/23/2020, "Jewish Democratic</p> <p>5 Leader Smears Richard Grenell as</p> <p>6 Nazi Supporter - Then Blocks</p> <p>7 Critics" 64</p> <p>8 8 - Breitbart article dated 3 Jun 2018,</p> <p>9 "Trump's Right Hand Man in Europe</p> <p>10 Ric Grenell Wants to 'Empower'</p> <p>11 European Conservatives" 67</p> <p>12 9 - SPIEGEL International article dated</p> <p>13 11.01.2019, "Trump's Ambassador</p> <p>14 Finds Few Friends in Germany" 73</p> <p>15 10 - Vox article dated Jun 4, 2018,</p> <p>16 "Trump's ambassador to Germany</p> <p>17 talked to Breitbart - and started</p> <p>18 an international incident" 73</p> <p>19 11 - Plaintiff Grenell's Objections to</p> <p>20 Defendant Troye's First Set of</p> <p>21 Interrogatories 83</p> <p>22</p>

<p style="text-align: right;">Page 50</p> <p>1 history. I can prove it."</p> <p>2 A. Yeah.</p> <p>3 Q. If you look at this article, I recognize</p> <p>4 you didn't see it, they gave you four Pinocchios?</p> <p>5 A. That's Glenn Kessler, who is a known</p> <p>6 lefty. So he doesn't like President Trump.</p> <p>7 Q. Understood.</p> <p>8 MR. BINNALL: And I'm going to object to</p> <p>9 the relevance of this article.</p> <p>10 MR. ZAID: That's fine.</p> <p>11 Our interrogatory responses to them,</p> <p>12 February 15, 2023. Actually, I marked the articles</p> <p>13 Exhibit 5, right?</p> <p>14 THE WITNESS: Yes.</p> <p>15 MR. ZAID: I can stay with the complaint</p> <p>16 while you find that.</p> <p>17 BY MR. ZAID:</p> <p>18 Q. The tweet that Congressman Swalwell made</p> <p>19 about saying you hang out with Nazis -- yeah, so I'm</p> <p>20 focusing still on the complaint, Exhibit 4, on page</p> <p>21 5.</p> <p>22 The tweet that Eric Swalwell said that you</p>	<p style="text-align: right;">Page 52</p> <p>1 enough, that you would know who they are, meaning</p> <p>2 they're public figures?</p> <p>3 MR. BINNALL: Objection to form. You can</p> <p>4 answer.</p> <p>5 THE WITNESS: I think they're all lefties</p> <p>6 who hate Trump, yeah.</p> <p>7 BY MR. ZAID:</p> <p>8 Q. Now, you indicated that Ms. Troye's tweet</p> <p>9 itself has caused you to suffer significant damages.</p> <p>10 What specifically has that tweet caused you to</p> <p>11 suffer?</p> <p>12 A. Well, again, most of the other people that</p> <p>13 were tweeting about this were outsiders, people who</p> <p>14 were not on the inside. They were Trump haters. She</p> <p>15 is elevating this as an insider, as somebody who has</p> <p>16 got the proof, who is on the inside.</p> <p>17 This is different than a Democratic</p> <p>18 Congressman throwing shade from the outside. This is</p> <p>19 somebody who is on the inside who says, I actually</p> <p>20 have the proof. I'm the one who has it, and here's</p> <p>21 exactly what it is. So that is another level of</p> <p>22 reputational damage.</p>
<p style="text-align: right;">Page 51</p> <p>1 used to hang out with Nazis, do you believe that that</p> <p>2 tweet caused you any harm?</p> <p>3 A. Well, he consistently tweets that, so --</p> <p>4 as a campaign political type. Of course, it is</p> <p>5 erroneous, and whenever anybody repeats anything</p> <p>6 erroneous, it's problematic.</p> <p>7 Q. And the same for Congressman Lieu's tweets</p> <p>8 about whether you associate with Nazis, do you</p> <p>9 believe that those tweets caused you harm?</p> <p>10 A. Correct, yes.</p> <p>11 Q. And in fact, there are others who have</p> <p>12 commented on Twitter --</p> <p>13 A. You.</p> <p>14 Q. I don't believe I've ever commented that</p> <p>15 you hung out with Nazis.</p> <p>16 A. You've pushed that meme. You definitely</p> <p>17 have.</p> <p>18 Q. Do you recall when I did that?</p> <p>19 A. No.</p> <p>20 Q. Okay. That's fine. But there are others</p> <p>21 who have on Twitter, people who are -- none of us</p> <p>22 know who they are, as well as, I guess, people, fair</p>	<p style="text-align: right;">Page 53</p> <p>1 Q. Is there anything that you can state</p> <p>2 specifically with respect to damages, or is it just</p> <p>3 this generic reputational aspect?</p> <p>4 A. Well, I think the reputational damage is</p> <p>5 never really generic. It's an assault on your</p> <p>6 reputation publicly from inside the Mike Pence staff</p> <p>7 saying, I have the proof. That's another level of</p> <p>8 reputational damage.</p> <p>9 Q. Sorry for the delay.</p> <p>10 A. No problem.</p> <p>11 Q. So I will have marked as Exhibit 6 --</p> <p>12 we're still going over the complaint, so you can keep</p> <p>13 that separate for now.</p> <p>14 A. Okay.</p> <p>15 (Grenell Exhibit No. 6 was identified</p> <p>16 for the record.)</p> <p>17 BY MR. ZAID:</p> <p>18 Q. I just had marked as Exhibit 6, Defendant</p> <p>19 Olivia Troye's revised responses and objections to</p> <p>20 Plaintiff Richard Grenell's first interrogatories</p> <p>21 dated February 15, 2023.</p> <p>22 Is this a document you have reviewed or</p>

<p style="text-align: right;">Page 54</p> <p>1 have you reviewed this document before?</p> <p>2 A. I am sure I have. I don't remember.</p> <p>3 Q. Okay. So if I turn your attention to</p> <p>4 pages 3, 4, and 5, that is Ms. Troye's response to</p> <p>5 identify those who basically have served as the</p> <p>6 source of her knowledge.</p> <p>7 Now, I asked you some of those names that</p> <p>8 are referenced in here, which other than Alyssa</p> <p>9 Griffin, you had indicated you did not know. So I</p> <p>10 won't ask you about those individuals.</p> <p>11 At least based on the description that is</p> <p>12 set forth in here, the impression that this conveys</p> <p>13 is that something happened while the Vice President</p> <p>14 either before or coming over to visit Germany. To</p> <p>15 the best of your recollection, was there any issue</p> <p>16 that you had with your staff or the Vice President's</p> <p>17 about any event he was going to go to?</p> <p>18 MR. BINNALL: Objection to form. You can</p> <p>19 answer.</p> <p>20 THE WITNESS: So that seemed like a really</p> <p>21 general question of, was there anything that I said</p> <p>22 to the Vice President?</p>	<p style="text-align: right;">Page 56</p> <p>1 answer.</p> <p>2 THE WITNESS: So first of all, I never</p> <p>3 asked anybody to go to -- if that's the question. I</p> <p>4 never asked anyone to attend any white supremacist or</p> <p>5 Nazi event. But your question was, did Stephanie</p> <p>6 tell --</p> <p>7 MR. ZAID:</p> <p>8 Q. No, you wouldn't know that. So, no, I was</p> <p>9 just asking whether there was --</p> <p>10 A. So just --</p> <p>11 Q. -- some factual accuracy to her comment.</p> <p>12 MR. BINNALL: Let him finish his question.</p> <p>13 BY MR. ZAID:</p> <p>14 Q. That's okay. You answered it, exactly</p> <p>15 what I asked. There's an indication that Ms. Cowan</p> <p>16 was so furious she wanted to quit. Is there anything</p> <p>17 that you can recall with respect to Vice President</p> <p>18 Pence's trip to Germany that would have led someone</p> <p>19 to have that view?</p> <p>20 A. Nothing that I know of.</p> <p>21 Q. And Ms. Griffin supposedly said to</p> <p>22 Ms. Troye, there was -- no, strike that. Don't worry</p>
<p style="text-align: right;">Page 55</p> <p>1 BY MR. ZAID:</p> <p>2 Q. No.</p> <p>3 A. What's your question?</p> <p>4 Q. Not that you said. To the best of your</p> <p>5 recollection, was there any type of conflict between</p> <p>6 you and your staff or you and the Vice President's</p> <p>7 staff about his itinerary?</p> <p>8 MR. BINNALL: Objection to form. You can</p> <p>9 answer.</p> <p>10 THE WITNESS: Nothing to my recollection,</p> <p>11 other than, we, at the embassy, wanted to see a</p> <p>12 chamber luncheon.</p> <p>13 BY MR. ZAID:</p> <p>14 Q. The one you talked about already?</p> <p>15 A. Yes.</p> <p>16 Q. So where it says on page 4 -- and some of</p> <p>17 it we've gone over, I just want to get it down, where</p> <p>18 it is indicated by Ms. Troye, not saying that this is</p> <p>19 true or accurate, this is what Ms. Troye says. That</p> <p>20 Stephanie told her that Ric and Al tried to get Pence</p> <p>21 to go to an event with Nazis. True or false?</p> <p>22 MR. BINNALL: Objection to form. You can</p>	<p style="text-align: right;">Page 57</p> <p>1 about it.</p> <p>2 Now, you talked about reputational damage.</p> <p>3 Have you lost any income because of Ms. Troye's</p> <p>4 tweets?</p> <p>5 A. How would I know? Nothing that I know.</p> <p>6 Q. Has anyone -- have you had any</p> <p>7 conversations with anyone, besides your lawyers and</p> <p>8 your partner, about Ms. Troye's tweets or tweet?</p> <p>9 A. Not that I can recall.</p> <p>10 Q. Did anyone from Affinity ever mention</p> <p>11 Ms. Troye's tweet to you?</p> <p>12 A. Never.</p> <p>13 Q. Did anyone from Exos ever mention</p> <p>14 Ms. Troye's tweet to you?</p> <p>15 A. Never.</p> <p>16 Q. Did anybody from Newsmax ever mention the</p> <p>17 Olivia Troye tweet to you?</p> <p>18 A. Not that I recall, although it might have</p> <p>19 been on Newsmax.</p> <p>20 Q. From the --</p> <p>21 A. Her tweet from the original tweet.</p> <p>22 Q. Okay. The two national political</p>

<p style="text-align: right;">Page 86</p> <p>1 MR. BINNALL: I think we're looking at a</p> <p>2 different document. Can we get the version of</p> <p>3 Exhibit 12 that you have?</p> <p>4 MR. ZAID: That's the document production.</p> <p>5 March 8th.</p> <p>6 BY MR. ZAID:</p> <p>7 Q. So my question actually pertains back to</p> <p>8 Exhibit 11, if you have any knowledge that's</p> <p>9 non-privileged as to why you did not verify your</p> <p>10 answers?</p> <p>11 A. I don't.</p> <p>12 MR. BINNALL: Object. It calls for a</p> <p>13 legal conclusion.</p> <p>14 BY MR. ZAID:</p> <p>15 Q. Do you know who Tom Wright is at</p> <p>16 Brookings?</p> <p>17 A. I don't.</p> <p>18 Q. How about Anne Applebaum?</p> <p>19 A. I just know her as a very hard lefty</p> <p>20 reporter. I don't believe I've ever met her.</p> <p>21 Q. Alexander Gauland, one of the AfD leaders,</p> <p>22 do you recall if you ever met him?</p>	<p style="text-align: right;">Page 88</p> <p>1 A. Two things. One, when you're telling the</p> <p>2 truth, you don't have to try to remember anything.</p> <p>3 And I never associated with Nazis, so I knew she was</p> <p>4 lying. And I knew she knew she was lying because she</p> <p>5 was coming from inside the Pence team.</p> <p>6 And two, later on, I realized because when</p> <p>7 I saw the emails that she was sending to people, she</p> <p>8 didn't recall. And she was fishing for some sort of</p> <p>9 an example.</p> <p>10 Q. And if you look further at your answer, in</p> <p>11 your last sentence, you wrote, "She chose to</p> <p>12 fabricate those vile accusations, making the</p> <p>13 conscious decision to lie about Mr. Grenell."</p> <p>14 Why is it that you believe she made a</p> <p>15 conscious decision to lie about you?</p> <p>16 A. Because she took two Congressmen who had</p> <p>17 said, do you have proof? And she said, I do. They</p> <p>18 asked a question publicly, do you have proof? They</p> <p>19 didn't ask her, but she jumped in to say, I do.</p> <p>20 Q. Now, would you agree with me that you</p> <p>21 don't know what was told to Ms. Troye by other</p> <p>22 members of the Vice President's staff about his trip</p>
<p style="text-align: right;">Page 87</p> <p>1 A. I don't recall.</p> <p>2 Q. And did you ever meet with Prime Minister</p> <p>3 Kurz?</p> <p>4 A. Sure, yes.</p> <p>5 Q. Now, if you look at interrogatory number</p> <p>6 17 on page 10.</p> <p>7 A. Sorry, Exhibit 11 or 12?</p> <p>8 Q. 12.</p> <p>9 A. Okay.</p> <p>10 Q. The March 8th set of responses.</p> <p>11 A. I'm sorry, say that one more time?</p> <p>12 Q. Sure. Page 10, interrogatory 17.</p> <p>13 A. Okay.</p> <p>14 Q. The question states, "Please describe how</p> <p>15 Defendant 'decided to lie about' Plaintiff as stated</p> <p>16 in your Complaint."</p> <p>17 And your response was that, "Ms. Troye</p> <p>18 knew when she published her tweet that" you "did not</p> <p>19 associate with Nazis."</p> <p>20 How is it that you formed the opinion that</p> <p>21 she knew when she did -- published her tweet that you</p> <p>22 didn't associate with Nazis?</p>	<p style="text-align: right;">Page 89</p> <p>1 to Germany --</p> <p>2 A. Is that an admittance that she --</p> <p>3 MR. BINNALL: Objection to form. You can</p> <p>4 answer.</p> <p>5 THE WITNESS: -- was misled?</p> <p>6 BY MR. ZAID:</p> <p>7 Q. Who knows, right?</p> <p>8 A. That's pretty amazing, if she said, I do,</p> <p>9 I have proof, and then she didn't have proof.</p> <p>10 So all I'm saying is, nobody asked her.</p> <p>11 She volunteered to step up to say, I have proof.</p> <p>12 It's a whole other level, it's a whole other bar to</p> <p>13 volunteering that she has the proof. I think that's</p> <p>14 why we're here.</p> <p>15 Q. But you don't know if anyone inside the</p> <p>16 Vice President's staff --</p> <p>17 A. I do know. No one has any proof of that,</p> <p>18 because it did not happen.</p> <p>19 Q. If you look at the next page, page 11,</p> <p>20 interrogatory number 19, we asked for you to describe</p> <p>21 how you've "been specifically harmed by Defendant's</p> <p>22 tweets, and identify any financial losses suffered as</p>

<p style="text-align: right;">Page 90</p> <p>1 a result."</p> <p>2 You wrote that the false allegation is,</p> <p>3 quote, "so obviously detrimental to his career, his</p> <p>4 business opportunities, and his ability to practice</p> <p>5 in his chosen profession that his damages are</p> <p>6 presumed," end quote.</p> <p>7 What detrimental aspects have happened to</p> <p>8 your career since Ms. Troye made her tweet?</p> <p>9 A. I think any time a gay man is called a</p> <p>10 Nazi organizer or trying to organize the Vice</p> <p>11 President of the United States to meet with Nazis or</p> <p>12 white supremacists, that is very damaging. I</p> <p>13 wouldn't be in -- I can't imagine being in the</p> <p>14 presence of someone who doesn't think that that is</p> <p>15 not damaging. It's awful.</p> <p>16 Q. But you're not aware of anyone ever</p> <p>17 commenting on -- to you directly --</p> <p>18 A. I think --</p> <p>19 Q. -- of Ms. Troye's tweet?</p> <p>20 A. I think it's something that's so egregious</p> <p>21 that nobody wants to bring up.</p> <p>22 Q. Obviously -- or "so obviously detrimental"</p>	<p style="text-align: right;">Page 92</p> <p>1 before you entered government, have you increased</p> <p>2 your income?</p> <p>3 A. Yes.</p> <p>4 Q. From -- to the extent -- do you know what</p> <p>5 your W-2 income was for 2022, roughly?</p> <p>6 A. I haven't filed yet.</p> <p>7 Q. For last year?</p> <p>8 A. Yeah.</p> <p>9 Q. Okay. Do you have any sense of, in 2023,</p> <p>10 now that we're halfway through, whether your income</p> <p>11 is higher in 2023 than it was in 2022?</p> <p>12 A. Good question. I'm not sure. I'd say</p> <p>13 relatively probably the same.</p> <p>14 Q. Okay. Has Ms. Troye's tweet impacted your</p> <p>15 ability to practice in your chosen profession, being</p> <p>16 the equity business?</p> <p>17 A. I really don't know what's being missed</p> <p>18 from these allegations.</p> <p>19 Q. Okay. In the political spectrum, has</p> <p>20 Ms. Troye's tweet negatively impacted you?</p> <p>21 A. Absolutely.</p> <p>22 Q. How so?</p>
<p style="text-align: right;">Page 91</p> <p>1 to your business opportunities. Can you identify any</p> <p>2 business opportunities that you've lost as a result,</p> <p>3 to your knowledge?</p> <p>4 A. I know of no one who has come forward to</p> <p>5 say to me, I'm not hiring you because you've</p> <p>6 organized with Nazis or tried to get others to</p> <p>7 organize with Nazis.</p> <p>8 Q. Since your time in leaving government,</p> <p>9 would you say you've been successful in your chosen</p> <p>10 career?</p> <p>11 A. I mean, I don't know what successful is.</p> <p>12 I mean, successful to me is honoring your parents and</p> <p>13 taking care of your parents and doing good, and I'm</p> <p>14 not a money-driven person.</p> <p>15 Q. Would you say -- have you -- let's put it</p> <p>16 this way. Have you increased your income since the</p> <p>17 time of leaving government service? Let me rephrase</p> <p>18 it, because obviously you made more money than you</p> <p>19 made in the government. So that's not a fair</p> <p>20 question. So let me take that back.</p> <p>21 A. I appreciate that.</p> <p>22 Q. From when you were in the private sector</p>	<p style="text-align: right;">Page 93</p> <p>1 A. I think there's articles from the left</p> <p>2 constantly saying -- Congressmen constantly saying</p> <p>3 that there is proof out there that I have tried to</p> <p>4 get the Vice President of the United States to meet</p> <p>5 with Nazis and the white supremacist group. It's the</p> <p>6 proof, I think, that's different than just the</p> <p>7 opinion.</p> <p>8 Q. Those on the political right that you work</p> <p>9 with, do you believe they give Ms. Troye any level of</p> <p>10 credibility -- or does Ms. Troye have any -- let me</p> <p>11 put it this way.</p> <p>12 Does Ms. Troye have any level of</p> <p>13 credibility that you know of within the political</p> <p>14 right?</p> <p>15 MR. BINNALL: Objection to the form. You</p> <p>16 can answer.</p> <p>17 THE WITNESS: Sure.</p> <p>18 BY MR. ZAID:</p> <p>19 Q. Do you think her views within the</p> <p>20 political right have adversely impacted you?</p> <p>21 A. This is not about a view. I want to make</p> <p>22 that very clear. This is about someone who stood up</p>

<p style="text-align: right;">Page 126</p> <p>1 Q. And in fact, you did tweet on June 26, you</p> <p>2 also said that -- to him, you are an apologist for</p> <p>3 pedophilia and child abuse. What is your basis for</p> <p>4 that?</p> <p>5 A. His legislation that he pushes to make</p> <p>6 man-boy love acceptable. I hope you don't agree with</p> <p>7 that. I think it's terrible. And to have a sitting</p> <p>8 Senator want to have the age of consent lowered, so</p> <p>9 that gay men can have sex with younger kids is pretty</p> <p>10 awful. And so when he attacks me, I'm really proud</p> <p>11 of it.</p> <p>12 Q. With respect to the impact of the</p> <p>13 statement in Ms. Troye's tweet, have you received any</p> <p>14 type of counseling for any emotional stress or</p> <p>15 damages that you suffered?</p> <p>16 A. No.</p> <p>17 Q. Are you on any medication as a result</p> <p>18 of --</p> <p>19 A. No.</p> <p>20 Q. Or impact from the tweet?</p> <p>21 A. Sorry, no.</p> <p>22 Q. The national political orgs that you work</p>	<p style="text-align: right;">Page 128</p> <p>1 Q. And the work for the other group, the</p> <p>2 non-radio, what type of work would specifically be</p> <p>3 involved with that?</p> <p>4 A. Oh, sorry, that's what I was asking --</p> <p>5 answering. The general board members, fund-raising</p> <p>6 advice. You know, just all sorts of stuff like that.</p> <p>7 Just to be clear, the one that I was talking about</p> <p>8 with radio, I don't give PR advice or do the general</p> <p>9 consulting or money raising, or things like that.</p> <p>10 Q. Those are political interviews?</p> <p>11 A. Yeah.</p> <p>12 Q. Type interviews?</p> <p>13 A. Correct. Pretty exclusively foreign</p> <p>14 policy.</p> <p>15 Q. Now, you were part of the -- you were part</p> <p>16 of the effort to challenge the election of 2020 in</p> <p>17 the State of Nevada at least; is that correct?</p> <p>18 A. Yeah. The way I would characterize it is,</p> <p>19 we exercised our constitutional right to get to the</p> <p>20 bottom of why certain things were happening that</p> <p>21 looked, you know, particularly bad.</p> <p>22 Q. Now, based on the efforts that you and</p>
<p style="text-align: right;">Page 127</p> <p>1 for, what, if you can describe, is covered by the</p> <p>2 NDA?</p> <p>3 A. Just not to disclose the fact that I have</p> <p>4 a contract with them.</p> <p>5 Q. Okay. Can you describe the type of work</p> <p>6 that you do for them without identifying who they</p> <p>7 are?</p> <p>8 A. Sure. One, radio interviews. And two is</p> <p>9 a generic advising, helping raise money where</p> <p>10 possible. You know, giving advice, in general.</p> <p>11 Q. That was --</p> <p>12 A. To board members type of stuff.</p> <p>13 Q. Sorry. Interviews that you conduct or to</p> <p>14 help arrange for interviews of others?</p> <p>15 A. No, no, sorry. No, that I do. I do</p> <p>16 multiple times a week.</p> <p>17 Q. That you interview?</p> <p>18 A. On average.</p> <p>19 Q. You're being interviewed or you interview</p> <p>20 someone?</p> <p>21 A. I'm being interviewed about foreign policy</p> <p>22 issues. Public, it's all public.</p>	<p style="text-align: right;">Page 129</p> <p>1 others, to your knowledge, that were engaged in to</p> <p>2 challenge, were any of them successful?</p> <p>3 A. No, specifically in Nevada, we weren't</p> <p>4 able to get to present our case, because we didn't</p> <p>5 have standing or a variety of different reasons.</p> <p>6 MR. BINNALL: Again, objection to</p> <p>7 relevancy on this line. Not reasonably calculated to</p> <p>8 result in admissible evidence.</p> <p>9 MR. ZAID: So I guess, Jesse, based on the</p> <p>10 conversations that you and Tom had with respect to</p> <p>11 the NDAs and any more details, our not asking further</p> <p>12 probing questions is not a waiver of that. We'll</p> <p>13 either revisit with you or submit other written</p> <p>14 discovery within, obviously, the time period.</p> <p>15 MR. BINNALL: We'll meet and confer on</p> <p>16 that.</p> <p>17 MR. ZAID: I have nothing further.</p> <p>18 MR. BINNALL: Can we just take a quick</p> <p>19 break? I don't think I'm going to have much, if any,</p> <p>20 redirect, but I just want to take a moment.</p> <p>21 MR. ZAID: Sure.</p> <p>22 THE VIDEOGRAPHER: Off the record at</p>

<p style="text-align: right;">Page 130</p> <p>1 12:23.</p> <p>2 (Recess.)</p> <p>3 THE VIDEOGRAPHER: On the record at 12:27.</p> <p>4 MR. BINNALL: All right. We don't have</p> <p>5 any questions. He is going to read.</p> <p>6 MR. ZAID: With that, we're done.</p> <p>7 THE VIDEOGRAPHER: Off the record at</p> <p>8 12:28.</p> <p>9 (Whereupon, at 12:28 p.m., the instant</p> <p>10 deposition ceased.)</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	
<p style="text-align: right;">Page 131</p> <p>1 CERTIFICATE OF REPORTER</p> <p>2</p> <p>3 UNITED STATES OF AMERICA) ss:</p> <p>4 COMMONWEALTH OF VIRGINIA)</p> <p>5 I, Desirae S. Jura, RPR, the officer before whom</p> <p>6 the foregoing proceedings were taken, do hereby</p> <p>7 certify that the foregoing transcript is a true and</p> <p>8 correct record of the proceedings; that said</p> <p>9 proceedings were taken by me stenographically to the</p> <p>10 best of my ability and thereafter reduced to</p> <p>11 typewriting under my supervision; and that I am</p> <p>12 neither counsel for, related to, nor employed by any</p> <p>13 parties to this case and have no interest, financial</p> <p>14 or otherwise, in its outcome.</p> <p>15</p> <p>16</p> <p>17 _____</p> <p>18 Notary Public in and for the</p> <p>19 Commonwealth of Virginia</p> <p>20</p> <p>21</p> <p>22 My commission expires: 11/30/2023</p>	

Notice Date: 07/20/2023

Deposition Date: 7/17/2023

Deponent: Richard Grenell

Case Name: Richard Grenell v. Olivia Troye

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CERTIFICATE OF DEPONENT

I hereby certify that I have read and examined the foregoing transcript, and the same is a true and accurate record of the testimony given by me. Any additions or corrections that I feel are necessary, I will attach on a separate sheet of paper to the original transcript.

Signature of Deponent

I hereby certify that the individual representing himself/herself to be the above-named individual, appeared before me this ____ day of _____, 20__, and executed the above certificate in my presence.

NOTARY PUBLIC IN AND FOR

County Name

MY COMMISSION EXPIRES: